

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider Staff
Proposal Concerning Revision or Repeal of
General Orders and Utility Reporting
Requirements.

R. _____

ORDER INSTITUTING RULEMAKING**Summary**

We open this rulemaking to consider a staff proposal seeking to revise or repeal 28 utility reports and General Orders (GOs) and to correct a publishing error in one GO. The staff proposal is part of a pilot process known as a Solicitation for Input process, first utilized in January 2015, to determine whether an opportunity for informal input might streamline Commission processes and facilitate public participation. We seek comment on the substance of the revisions and repeals contained in the Staff Proposal. Specifically, for each revision or repeal contained in the Staff Proposal, we seek comment on: (1) whether the requirement is out of date and ripe for updating; (2) if so, why; and (3) whether the Staff Proposal for revision or repeal is appropriate and adequate.

1. Background

Governor Brown designated Commissioner Michael Picker as the assigned Commissioner responsible for overseeing a review and assessment of the Commission's existing organization, processes, and procedures, identifying areas in which improvements may be possible, and recommending constructive

changes for modernizing and reforming them. In furtherance of these goals, the Commission initiated a new process – a Solicitation for Input (SFI) – as a pilot program to see whether providing notice and opportunity for informal input from the public concerning certain proposed changes in Commission policy, procedure and regulation can provide a less time-consuming and expensive means for the public to participate in Commission proceedings and for streamlining some of our existing processes.

Under the SFI pilot process, industry division staff have been allocated increased responsibility and authority to initiate informal consultations with a broad range of community groups, members of the public and other interested stakeholders to evaluate public concerns and pertinent technical issues and formulate appropriate, technically sound solutions, prior to initiation by the Commission of a formal rulemaking.

On January 28, 2015, Commission staff released an SFI¹ inviting informal input from the public on what revisions, if any, should be made to dozens of rules and requirements applicable to public utilities in California.

The SFI was published on the Commission website, and was sent electronically utilizing the service lists from the following proceedings: investor-owned utility rate cases, Application (A.) 13-11-003, A.13-12-012, and A.12-11-009; water action plan update rulemaking (R.) 11-11-008; residential rate design rulemaking, R.12-06-013; electric and communications infrastructure safety rulemakings, R.08-11-005 and R.14-08-012; California High Cost Fund-A

¹ The SFI can be found at: <http://www.cpuc.ca.gov/PUC/hottopics/7other/sfi.htm>.

rulemaking, R.11-11-007; and communications service quality rulemaking, R.11-12-001.

Informal comments on the SFI were received on March 27, 2015, and reply comments on April 17, 2015. The following entities submitted comments: AT&T California; California Water Association; California Cable & Telecommunications Association; Consumer Federation of California; Frontier Communications Company of California; Pacific Gas and Electric Company (PG&E); Southern California Edison Company (SCE); Southern California Gas Company (SoCalGas); San Diego Gas & Electric Company (SDG&E); The Utility Reform Network; The Small Local Exchange Carriers;² and Verizon Communications.

Comments addressed many, but not all, of the staff proposals contained in the SFI, and identified forty-three additional GOs and utility reports as potentially ripe for revision or repeal. Several comments concerned the SFI pilot program process and were generally supportive of the new process.

Based on the SFI process, on July 23, 2015, the Commission opened R.15-07-025 in order to consider the repeal of three GOs. The Commission adopted a final decision, D.15-08-034, in R.15-07-025 on August 27, 2015.

The Staff Proposal under consideration in this rulemaking contains the second tranche of proposals for modernization of the Commission's existing GOs and utility reporting requirements under the new SFI pilot process.

² The Small Local Exchange Carriers are Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., The Siskiyou Telephone Company, Volcano Telephone Company and Winterhaven Telephone Company.

2. Staff Proposal

The Staff Proposal contains recommendations to repeal or revise 29 GOs and utility reports, including six staff proposals originally included in the January 2015 SFI, plus 23 new recommendations made by commenters in their SFI comments.

Staff contends that the repeals and revisions in this proposal are narrowly tailored to meet the Commission's need for information in support of its oversight responsibilities, and staff does not anticipate any adverse safety impact from any of the proposals.

With respect to proposed repeals, staff contends that the proposed repeals pertain to information that the Commission either no longer needs or which is available elsewhere, either in new reporting requirements or online on publicly accessible websites.

With respect to the proposed changes to utility report filing schedules, staff contends that, with two exceptions, the existing reporting frequencies are in excess of that which is required for diligent program management.

The Staff Proposal is attached to this Order Instituting Rulemaking (OIR) as Attachment A.

3. Preliminary Scoping Memo

The preliminary scope of issues and schedule of the proceeding are set forth below, and may be changed by the assigned Commissioner's scoping memo. (*See Rule 7.3.*)

3.1 Issues

- 1) Should the Staff Proposal, as set forth in Attachment A of this rulemaking, to repeal or revise twenty-nine General Orders and utility reports be adopted in whole or in part?

- 2) Are the General Orders and utility reports that are the subject of the Staff Proposal out of date and ripe for updating, and, if so, for what reasons?
- 3) Are there any safety implications from the repeal and revisions of these twenty-nine General Orders and utility reports?

3.2 Schedule

Date	Event
20 days from mailing of this OIR	Deadline for requests to be on Service List
30 days from mailing of this OIR	Initial Comments filed and served
45 days from mailing of this OIR	Reply Comments filed and served
If needed	Prehearing Conference
If needed	Scoping Memo
9 months from mailing of this OIR	Proposed Decision

Comments may address the substance of the revisions and repeals contained in the Staff Proposal, as well as any objections to or recommendations regarding this order's preliminary determinations as to category of the proceeding, the need for evidentiary hearing, issues to be considered, or scheduling.

4. Assigned Commissioner

President Michael Picker is hereby designated as the assigned Commissioner for this proceeding. (Pub. Util. Code Section 1701.1 and Rule 13.2.)

5. Category

The category of the proceeding is preliminarily determined to be quasi-legislative. Accordingly, *ex parte* communications are permitted without restriction or reporting requirements until and unless the category of the proceeding and/or applicable *ex parte* rules are changed in an assigned Commissioner scoping memo or assigned Commissioner or Administrative Law Judge ruling. (See Rules 7.3 and 8.3(a).).

6. Need for Hearing

It is preliminarily determined that evidentiary hearings will not be needed in this proceeding.

7. Service of OIR

Items 1, 17, and 29 of the Staff Proposal affect public utilities across industries. Items 3, 6, and 7 affect reporting requirements that apply to the telecommunications industry. Items 10, 20, 21, and 22 affect reporting requirements that apply to administrators of the California Solar Initiative program. The remainder of the items in the Staff Proposal affects reporting requirements of PG&E, SCE, or SDG&E. Items 4 and 19 also apply to SoCalGas.

In the interest of broad notice, this OIR will be served on the official service lists for the following dockets: PG&E's 2014 General Rate Case (A.12-11-009); PG&E's gas transmission and storage rate case (A.13-12-012); SCE's 2015 General Rate Case (A.13-11-003); SDG&E's 2016 General Rate Case (A.14-11-003); SoCalGas's 2016 General Rate Case (A.14-11-004); SoCalGas/SDG&E/SCE's application for changes to natural gas operations and service (A.06-08-026); the residential rate design rulemaking (R.12-06-013); the long term procurement plan proceeding (R.13-12-010); the California Solar Initiative rulemaking (R.12-11-005); the advanced metering infrastructure

proceedings (A.05-06-028, A.05-03-015, and A.07-07-026); the electric and communications infrastructure safety rulemakings (R.08-11-005 and R.14-08-012); California High Cost Fund-A rulemaking (R.11-11-007); communications service quality rulemaking (R.11-12-001); the Lifeline rulemaking (R.11-03-013); water action plan update (R.11-11-008); rail safety rulemakings (R.08-10-007 and R.13-03-009); and transportation network companies rulemaking (R.12-12-011), and the first SFI rulemaking (R.15-07-025).

In addition, this OIR will be served on the individuals and organizations who signed up for the SFI Listserv.³

Service of the OIR does not confer party status or place a person or organization that has received such service on the Official Service List for this proceeding, except as otherwise noted with regard to persons and organizations that previously responded to the SFI. To be placed on the service list, persons or entities should follow the instructions in Section 8 below.

8. Addition to Official Service List

Additions to the official service list shall be governed by Rule 1.9(f) of the Commission's Rules of Practice and Procedure.

Persons and organizations that previously provided informal comments on the SFI through the SFI Listserv, specifically AT&T California, California Cable and Telecommunications Association, California Water Association, Consumer Federation of California, Frontier Communications Company of California, PG&E, SCE, SDG&E, SoCalGas, The Utility Reform Network, the Small Local Exchange Carriers, and Verizon Communications, are hereby made

³ These individuals and organizations are all on the official service list for R.15-07-025.

parties to this proceeding and need not file any additional comments on the rulemaking to preserve party status.

Any person will be added to the “Information Only” category of the official service list upon request, for electronic service of all documents in the proceeding, and should do so promptly in order to ensure timely service of comments and other documents and correspondence in the proceeding. (See Rule 1.9(f).) The request must be sent to the Process Office by e-mail (process_office@cpuc.ca.gov) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102). Please include the Docket Number of this rulemaking in the request.

Persons who file responsive comments thereby become parties to the proceeding (See Rule 1.4(a)(2)) and will be added to the “Parties” category of the official service list upon such filing. *In order to assure service of comments and other documents and correspondence in advance of obtaining party status, persons should promptly request addition to the “Information Only” category as described above; they will be removed from that category upon obtaining party status.*

9. Subscription Service

Persons may monitor the proceeding by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission’s website. There is no need to be on the official service list in order to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission’s website at <http://subscribecpuc.cpuc.ca.gov/>.

10. Filing and Service of Comments and Other Documents

Filing and service of comments and other documents in the proceeding are governed by the rules contained in Article 1 of the Commission’s Rules of Practice and Procedure. (See particularly Rules 1.5 through 1.10 and 1.13.) If you

have questions about the Commission's filing and service procedures, contact the Docket Office (Docket_Office@cpuca.ca.gov) or check the Practitioners' Page on our web site at www.cpuc.ca.gov.

11. Public Advisor

Any person or entity interested in participating in this rulemaking who is unfamiliar with the Commission's procedures should contact the Commission's Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390 or e-mail public.advisor@cpuc.ca.gov. The TTY number is (866) 836-7825.

12. Intervenor Compensation

Any party that expects to claim intervenor compensation for its participation in this rulemaking must file its notice of intent to claim intervenor compensation within 30 days of the filing of comments, except that notice may be filed within 30 days of a prehearing conference in the event that one is held. (See Rule 17.1(a)(2).)

O R D E R

IT IS ORDERED that:

1. The Commission institutes this rulemaking on its own motion to consider the amendments to certain Commission rules and requirements contained in the Staff Proposal attached to this rulemaking as Attachment A.

2. Persons and organizations that previously provided informal comments on the Solicitation for Input (SFI) through the SFI Listserv, specifically AT&T California, California Cable and Telecommunications Association, California Water Association, Consumer Federation of California, Frontier Communications Company of California, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Southern California Gas

Company, The Utility Reform Network, the Small Local Exchange Carriers (Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., The Siskiyou Telephone Company, Volcano Telephone Company and Winterhaven Telephone Company), and Verizon Communications are hereby made parties to this proceeding and need not file any additional comments on the rulemaking to preserve party status, and must contact the Commission's Process Office (process_office@cpuc.ca.gov) should they not want to maintain party status.

3. Any and all informal comments previously provided in response to the Solicitation for Input (SFI) on the SFI pilot substance and process through the SFI Listserv, copies of which are attached as Attachment B, are hereby incorporated into the record in this proceeding and need not be repeated or refiled to be considered by the Commission in its decision in this proceeding.

4. This proceeding is preliminarily classified as quasi-legislative, and it is preliminarily determined that evidentiary hearings will not be necessary.

5. No later than 30 days after the Commission issues this Order Instituting Rulemaking, any person or organization may file initial comments on the Staff Proposal in Attachment A. Comments may also address the issues set forth in the Preliminary Scoping Memo in Section 3 of this rulemaking, or on the schedule, categorization, or need for hearings.

6. The Executive Director shall cause this Order Instituting Rulemaking to be served on the following service lists: Pacific Gas and Electric Company's (PG&E) 2014 General Rate Case (Application (A.) 12-11-009); PG&E's gas transmission and storage rate case (A.13-12-012); Southern California Edison Company's (SCE)

2015 General Rate Case (A.13-11-003); San Diego Gas & Electric Company's (SDG&E) 2016 General Rate Case (A.14-11-003); Southern California Gas Company's (SoCalGas) 2016 General Rate Case (A.14-11-004); SoCalGas/SDG&E/SCE's application for changes to natural gas operations and service (A.06-08-026); the residential rate design rulemaking (Rulemaking (R.) 12-06-013); the long term procurement plan proceeding (R.13-12-010); the California Solar Initiative rulemaking (R.12-11-005); the advanced metering infrastructure proceedings (A.05-06-028, A.05-03-015, and A.07-07-026); the electric and communications infrastructure safety rulemakings (R.08-11-005 and R.14-08-012); California High Cost Fund-A rulemaking (R.11-11-007); communications service quality rulemaking (R.11-12-001); the Lifeline rulemaking (R.11-03-013); water action plan update (R.11-11-008); rail safety rulemakings (R.08-10-007 and R.13-03-009); transportation network companies rulemaking (R.12-12-011); and the first SFI rulemaking (R.15-07-025).

7. A party that expects to request intervenor compensation for its participation in this rulemaking must file its notice of intent to claim intervenor compensation within 30 days of the filing of comments, except that notice may be filed within 30 days of a prehearing conference in the event that one is held (*See* Rule 17.1(a)(2).)

8. *Ex parte* communications in this rulemaking are governed by Rule 8.3(a) of the Commission's Rules of Practice and Procedure.

9. The assigned Commissioner or Administrative Law Judge may adjust the schedule identified herein and refine the scope of this proceeding as needed to promote the efficient and fair resolution of the rulemaking.

This order is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT A

Solicitation for Input

Staff Straw Proposal

Overview and Objective

This document contains the second tranche of staff proposals for modernization of the Commission's existing General Orders (GOs) and utility reporting requirements under the new Solicitation for Input (SFI) process.

In January 2015, the Commission launched a pilot program known as a SFI in order to determine whether an opportunity for informal comment concerning proposed changes in Commission policy, procedure and regulation might streamline Commission processes and facilitate public participation.

Commission staff distributed a list of GOs and utility reporting requirements that were potentially out of date and ripe for revision or repeal and sought informal comment on the merits of individual staff proposals concerning the GOs and utility reports as well as the processes the Commission may wish to follow in order to update them.

Entities filed comments to some of the staff proposals in that list, and identified forty-three additional GOs and utility reports as potentially ripe for revision or repeal.

Policy and Planning Division staff consulted with the Commission's Industry Divisions when evaluating the additional forty-three recommendations, and twenty-three of those additional recommendations are ultimately included in this Staff Proposal, along with six staff proposals originally included in the January SFI.

The repeals and revisions in this proposal are narrowly tailored to meet the Commission's need for information in support of its oversight responsibilities, and staff does not anticipate any adverse safety impact from any of the proposals contained below.

The proposed repeals contain information that the Commission either no longer needs or which is available elsewhere, either in new reporting requirements or online on publicly accessible websites. The proposed repeals include, e.g., reporting requirements that have been superseded by new reporting requirements subsequently adopted by the Commission; reporting

requirements concerning programs that are nearly complete or expiring; reports on business models that have been nearly eliminated due to technological change; and reports that monitor consumer adoption of a technology twenty years after its introduction.

With respect to the proposed changes to utility report filing schedules, staff proposes that, with a few exceptions¹, the existing reporting frequencies are in excess of that which is required for diligent program management. Excessive reports impose an unnecessary administrative burden on the utilities and squander Commission staff time, both of which ultimately increase the cost of service for ratepayers without providing a corresponding benefit.

While staff is using this iteration of the SFI process largely to repeal or reduce the frequency of utility reports, industry division staff may use the SFI process in the future to increase the frequency or substance of utility reporting requirements if their administration of a program suggests that more information is needed or if there is a change in circumstances.

For all revisions below:

- a) when staff proposes to **repeal a requirement**, staff proposes to repeal the requirement as of the effective date of a Commission decision approving the proposal;
- b) when staff proposes to **revise the frequency of a utility report**, staff proposes that the revision shall be effective as of the most recently filed report prior to the effective date of a Commission decision approving the proposal. For example, if staff proposes to change a utility report from quarterly to annual, the first annual report will be due one year from the most recently filed quarterly report; and
- c) when Staff proposes **administrative changes**, staff proposes that those administrative changes are effective as of the effective date of a Commission decision approving the proposal.

¹ For example, staff determines that certain information submitted for the California Solar Initiative is required more frequently than originally required; see items 21 and 22.

I. Proposed Repeals**1. GO 65-A****Background**

GO 65-A, dating from 1968, requires public utilities with gross operating revenues of at least \$200,000 to file copies of their financial statements, annual reports, and statements to shareholders with the Commission.

In the SFI, Staff proposed to eliminate the reporting requirements in GO 65-A, because financial information of this nature is now publicly available online.

In their comments, Pacific Bell Telephone d/b/a AT&T California (AT&T), California Water Association, Frontier, Verizon, Southern California Gas (SoCal Gas), Pacific Gas & Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) supported eliminating the reporting requirements in GO 65-A. The Utility Reform Network (TURN) suggested either modifying GO 65-A, consolidating it with another GO, or exempting from the reporting requirement those entities that post the required information on their own websites.

Discussion

GO 65-A's reporting requirements pre-date the availability of corporate financial information on public websites, and no commenter suggested that public utilities should be required to file GO 65-A reports when such information is available online. It is a waste of resources to require companies to file paper reports with the Commission containing information that Commission staff can easily find online, therefore GO 65-A is modified as follows:

It is hereby ordered that each public utility having annual gross operating revenues of \$200,000 or more shall file with the Public Utilities

Commission of the State of California a copy of each financial statement prepared in the normal course of business, either monthly or for other definite period, which show, among other things, the operating results for the period, and the financial condition at the end of such period. In addition, every corporation having annual gross operating revenues of \$200,000 or more shall file with the Public Utilities Commission a copy of its annual report and other financial statements issued to its stockholders.

Public utilities whose financial statements and shareholder reports are

available on a public website are not required to file copies of such statements and reports with the Public Utilities Commission.

2. PG&E Report on Sole Customer Facility Sale Transactions

Background

Public Utilities Code § 851 requires public utilities to seek Commission approval prior to selling or encumbering utility property. In Decision (D.) 99-12-030, the Commission approved PG&E's application for an advice letter process and standard form contract for certain sales valued at \$250,000 or less, and required PG&E to submit an annual report "...listing any and all sales entered into and approved by the Commission pursuant to the advice letter procedures described herein."

The Commission subsequently promulgated GO 173, which establishes an advice letter process for regulated utilities' § 851 transactions involving utility property valued at \$5,000,000 or less. GO 173 requires all utilities to file annual reports containing information on all § 851 advice letters filed the previous year.

In the SFI, Staff proposed eliminating the reporting requirements applicable to PG&E pursuant to D.99-12-030 on the grounds that they duplicate the reporting requirements applicable to all public utilities under GO 173. PG&E submitted comments in support of Staff's proposal.

Discussion

D.99-12-030 created an advice letter process and reporting requirement for one utility's § 851 transactions of \$250,000 or less, and GO 173 expanded the advice letter process to cover all utilities' § 851 transactions valued up to \$5,000,000. GO 173 is therefore applicable to all of the § 851 transactions that were the subject of D.99-12-030, making the limited advice letter process created in D.99-12-030 and its related reporting requirements moot. Therefore, the reporting requirement in D.99-12-030 is repealed, and GO 173 is modified as follows:

Rule 10. Annual Report Regarding Advice Letters Filed by Each Utility
Each utility that has filed one or more advice letters shall submit an annual list of advice letters filed to the appropriate Industry Division by no later than April 1 of each year, commencing on April 1, 2010. The first list filed pursuant to this provision shall include all advice letters filed between 2005, the year in which the Section 851 pilot program began, and the date

of the list's submission. Subsequent lists shall only include advice letters filed during the preceding year. Each list shall include the following: a) the name of the utility, b) the advice letter number, c) the date on which the advice letter was filed, d) a short summary of each advice letter filed, e) a short summary of the utility's efforts to comply with GO 156 in the transaction addressed in the advice letter, f) the date on which the advice letter was approved or denied, and g) if the advice letter was not approved, a brief statement of the reason. **This Annual Report replaces the Annual Report required in D.99-12-030.**

3. GO 152-A

Background

GO 152-A, adopted in 1988, sets forth rules governing the provision of private line alarm service, including reporting requirements for private line installation, maintenance and repair. In the SFI, staff proposed that GO 152-A be reviewed to determine its continued applicability and usefulness due to changes in technology, and recommended that GO 152-A's reporting requirements be repealed in the interim.

In their comments, AT&T, Frontier, and Verizon argued that the entire GO, including its reporting requirement, should be repealed. AT&T argued that its number of private line alarm links has declined almost 90% since 1988 to only 1,500 serving links, and that it had only 4 new installation orders in 2014. TURN argued that the Commission could consider amending the frequency of GO 152-A reports, but that the information remains relevant to the Commission's service quality oversight.

Discussion

Staff does not address the merits of a standalone proceeding examining the continued applicability and usefulness of GO 152-A. However, the nearly 90% decline in the number of AT&T's private line alarm links, to only 1,500 such links statewide, suggests that the alarm services subject to GO 152-A are no longer a significant part of the alarm market. As such, the reporting requirements in GO 152-A make a *de minimis* contribution to the Commission's service quality oversight, and no longer justify the resources that communications carriers devote to producing the reports or that the Commission devotes to receiving them.

GO 152-A's reporting requirements are repealed, and the relevant sections of GO 152-A are revised as follows:

The following sections are deleted in their entirety:

- 1.4. Information Available to the Public;
- 3.1.7. Reporting Frequency;
- 3.2.6. Reporting Frequency;
- 3.3.8. Reporting Frequency;
- 3.4.7. Reporting Frequency;
- 4.1. Reporting Units;
- 4.2. Report Levels; and
- 4.3. Reporting Requirements.

The following section is revised:

2.2.2. Reporting Service Level.

This level has been established to indicate reporting units which are performing significantly below the standard service level. Service that falls within this level will be considered inadequate ~~and will require a report to be made to the Commission.~~ Reporting service levels are applicable to each individual reporting unit.

4. SDG&E and SoCal Gas System Expansion Study

Background

Every three years, pursuant to a Settlement adopted in D.07-12-019, SoCal Gas and SDG&E file a system expansion study of their interconnect points, backbone system, and storage facilities with the Commission.² SoCal Gas and SDG&E recover the cost of these studies, and third party review of these studies, from ratepayers. In the SFI, staff noted that the Settlement expired in 2012 and that SoCal Gas has a separate approved expansion plan, and therefore proposed eliminating the study.

In its comments, SoCal Gas (responding on behalf of itself and SDG&E) argues that the study should be eliminated because they are not aware of any party having used any of the information in the study or requested to perform any of the expansion projects. Furthermore, SoCal Gas argues that the study is

² D.07-12-019, at 95.

unnecessary due to expansion analyses required in response to market conditions or specific requests as provided in D.04-09-022 and D.06-09-039.

Discussion

In approving SoCal Gas and SDG&E's proposal to conduct regular system expansion studies, the Commission noted that "[a]ll customers have the potential to benefit from the expansion of system capacity."³ However, it does not appear that any party has relied on the studies, making it doubtful that the studies have had any impact on system capacity expansion. As such, continuing to require system expansion studies would be an imprudent use of SoCal Gas, SDG&E, and ratepayer resources.

Furthermore, with respect to natural gas receipt point expansion, the Commission has determined that it is more appropriate for gas companies to respond to specific expansion proposals in a timely manner rather than produce cost estimates for options no one has requested.⁴ Therefore, the SoCal Gas System Expansion Study is repealed.

5. Advanced Metering Infrastructure Reports**Background**

The three electric IOUs – PG&E, SCE, and SDG&E – submit quarterly and annual AMI (Advanced Metering Infrastructure) reports detailing the progress of AMI implementation. In the SFI, staff observed that the AMI rollout is nearly complete for each of the three IOUs, making the report's continued usefulness unclear. Staff recommended that the Commission repeal the report.

In their comments, PG&E, SCE, and SDG&E recommended repealing the report because AMI rollout is nearly complete.

Discussion

The Commission approved AMI rollout plans for PG&E,⁵ SDG&E⁶, and SCE⁷ in 2006, 2007, and 2008, respectively. AMI rollout is nearing completion for

³ D.07-12-019, at 95.

⁴ D.06-09-039, at 35.

⁵ D.06-07-027.

all three IOUS, and the level of close monitoring required in the early phases of AMI deployment is no longer required. Accordingly, the quarterly and annual AMI implementation reports are repealed for PG&E, SCE, and SDG&E.

6. Annual Caller ID Blocking Report

Background

In a series of decisions⁸ in the early to mid-90's, the Commission established customer notification and education rules applicable to local exchange carriers (LECs) and competitive local exchange carriers (CLECs) concerning privacy implications of the then-novel service of "calling party number passage," commonly known as Caller ID. Among these rules is an Annual Caller ID Blocking Report containing information on, *inter alia*: number of subscribers, number of subscribers selecting Caller ID Blocking, number of subscribers changing their Caller ID Blocking selections, etc.

In its SFI comments, AT&T proposed eliminating the report because Caller ID is no longer a novel service.

Discussion

When the Commission established the Annual Caller ID Blocking Report, Caller ID was a brand new service, with novel implications for customer education and privacy. In the early days of Caller ID, the Annual Caller ID Blocking Report served a useful role in assisting early pattern recognition and trend analysis that allowed Commission staff to spot potential issues concerning customers' experience with Caller ID. For example, if large numbers of customers were repeatedly changing their Caller ID blocking selections, it might indicate that customers were having difficulty obtaining the information they needed to make informed choices to protect their privacy. In the intervening decades, however, the transmission of the calling party's phone number has become a routine and unexceptional part of voice telephony, and the privacy

⁶ D.07-04-043.

⁷ D.08-09-039.

⁸ D.92-11-062; D.92-06-065; D.96-04-049.

implications are no longer unfamiliar. As such, there is no longer any need for a reporting requirement developed to accompany the rollout of a new service.

The Annual Caller ID Blocking Report required of LECs and CLECs is therefore repealed.

7. GO 107-B

Background

GO 107-B sets forth rules and regulations concerning the monitoring and recording of telephone conversations. Among its other requirements, GO 107-B requires that telephone corporations file annual reports concerning wiretap devices found or suspected of having been installed on their networks, regardless of whether any such wiretap devices were actually found or suspected.

In its SFI comments, Verizon proposed eliminating the annual report on the grounds that it has not reported any wiretap devices for years.

Discussion

Public Utilities Code §§ 7905 and 7906 require that the Commission promulgate rules requiring telephone corporations to maintain records concerning wiretap devices and other aspects of communications privacy. GO 107-B contains record-keeping requirements in accordance with statute, but goes beyond the statute by requiring telephone corporations to file annual wiretap reports even when there is nothing to report.

There is no incremental benefit to communications privacy when telephone corporations are required to file annual reports when there is nothing to report, and therefore no justification for the administrative burden on telephone corporations required to file the report.

Therefore, while we retain the requirement in GO 107-B that telephone corporations file wiretap reports when a wiretap is found or suspected, we eliminate the requirement that they file reports in the absence of a known or suspected wiretap. GO 107-B is amended as follows:

D. Each telephone corporation which does not have instances during the year under Section A above and/or changes under Section C above ~~shall not be required to file a report for that year. shall file with the Commission on or before the 31st day of March each year one copy of a statement indicating it has no instances or changes during the year.~~

8. Top Ten SCE Executives' Total Compensation**Background**

Pursuant to D.04-07-022, the Commission requires that SCE file an annual report on the total compensation received by its ten most highly compensated executives.

In its SFI comments, SCE proposed that this report should be rescinded, because the information is duplicative of information required pursuant to GO 77-M.

Discussion

SCE is an electric corporation and a public utility, and pursuant to GO 77-M must annually file with the Commission a report detailing the names, titles, duties, and compensation of all Executives and related employees with a base salary of at least \$250,000 per year, and the names, titles, duties, and compensation of other employees with a base salary of at least \$125,000 per year.

GO 77-M requires the production of all the information required by the SCE Executive Compensation report required by D.04-07-022. The report required by D.04-07-022 is therefore duplicative and unnecessary, and accordingly is repealed.

9. Quarterly Reports on Installed Customer Generation under D.03-04-030 and Resolution E-3831**Background**

In D.03-04-030, the Commission established a Cost Responsibility Surcharge (CRS) applicable to customer generation departing load in order to prevent Direct Access customers from shifting responsibility for costs incurred on their behalf during the energy crisis to bundled service customers. In order to encourage the deployment of renewable energy, the Commission created exemptions from the CRS, but put a cap on the megawatts (MW) of statewide customer generation eligible for exemption from the CRS. In order to monitor the effectiveness of the CRS and ensure that bundled service customers were not paying a disproportionate share of costs dating from the energy crisis, the Commission required PG&E, SCE, and SDG&E to file quarterly reports on installed customer generation.

In its SFI comments, PG&E argued that this report should be rescinded, because the statewide MW cap has been reached.

Discussion

PG&E is correct that the state MW cap for CRS exemptions has been reached, and the IOUs have begun filing advice letters updating their tariffs to reflect the expiration of exemptions.⁹ Accordingly, there is no further need for Commission review of customer generation pursuant to D.03-04-030 and Resolution E-3831, and the Quarterly Reports on Installed Customer Generation are repealed.

10. California Solar Initiative Program Administrators Quarterly Report**Background**

Pursuant to D.10-09-046, California Solar Initiative Program Administrators must file quarterly reports concerning funds encumbered for residential and non-residential incentives, as well an estimate of funds needed for each Program Administrator to reach its megawatt program goals.

In its SFI comments, PG&E recommended repealing this report, because the information is available online.

Discussion

The information required in this report is available publicly online¹⁰ and readily available to Commission staff. Accordingly, as there is no longer any need to require that the information be submitted in a separate report, the report is repealed.

11. Demand Response Estimate for Each Smart Rate Season**Background**

Pursuant to D.06-07-027, PG&E must file an estimate of demand response load impact prior to each Smart Rate Season.

⁹ See, e.g., SCE Advice Letter 3263-E, filed on August 14, 2015.

¹⁰ The information is available at www.californiasolarstatistics.ca.gov.

In its SFI comments, PG&E argued that the Demand Response Estimate should be repealed because load impact is now part of the annual Load Impact Protocols analysis adopted in D.08-04-050.

Discussion

PG&E is correct that Smart Rate demand response estimates are already provided in the annual Load Impact Reports required by D.08-04-050, Protocol 26. The Demand Response estimate is redundant, and is therefore repealed.

II. Proposed Revisions to Filing Frequency or Filing Date

12. PG&E Safety Net Program

PG&E's Safety Net Program provides automatic bill credits for customers who lose service for at least 48 hours during a severe storm. Pursuant to D.04-05-055, PG&E must file quarterly Safety Net Program reports.

In its SFI comments, PG&E argued that the report frequency should be changed from quarterly to annually, or in every General Rate Case.

Storm-related service outages are largely seasonal, and do not occur with a frequency sufficient to justify quarterly reporting. Therefore, the frequency of PG&E Safety Net Report is changed to annual.

13. PG&E Quality Assurance Standards

PG&E Quality Assurance Program, as revised in D.04-05-055, contains metrics for PG&E's customer service, including, e.g., response time to non-emergency customer inquiries, transmission of first bill to new customers, etc. Pursuant to D.04-05-055, PG&E must file quarterly reports concerning its compliance with the Quality Assurance Program.

In its SFI comments, PG&E requested that the report frequency should be changed to annually, or in every General Rate Case.

Staff have ten years of experience reviewing PG&E's compliance with the Quality Assurance Program, and conclude that annual reporting is sufficient to monitor PG&E's performance going forward. Therefore, the frequency of PG&E's Quality Assurance Program report is changed to annual.

14. PG&E Call Center Performance Measure

Pursuant to D.04-10-034, PG&E is required to file quarterly reports concerning the timeliness of service provided by its customer service call centers.

In its SFI comments, PG&E requested that the report frequency should be changed to annually, or in every General Rate Case.

Staff have ten years of experience reviewing PG&E's compliance with the Call Center Performance Measure, and conclude that annual reporting is sufficient to monitor PG&E's performance going forward. Therefore, the frequency of PG&E's Call Center Performance Measure report is changed to annual.

15. Cogeneration and Small Power Production Report

Pursuant to Resolution E-1738, utilities must file semi-annual reports on cogeneration and small power production.

In their respective SFI comments, PG&E and SDG&E recommend repealing the report. PG&E argues that the information is now provided in a newer report adopted in the CHP Settlement, D.10-12-035, and SDG&E contends that the quantity of new relevant facilities has declined.

Staff rejects the recommendations of PG&E and SDG&E concerning outright repeal of this report. The CHP Settlement report pertains only to cogeneration facilities, while the report filed pursuant to Resolution E-1738 contains information on Qualifying Facilities other than cogeneration, therefore the CHP Settlement report has not superseded the Cogeneration and Small Power Production Report.

However, SDG&E rightly notes that the quantity of new relevant facilities has declined, therefore the frequency of the Cogeneration and Small Power Production report is changed from semi-annual to annual.

16. AB 970/GO 131-D Planning and Construction of Facilities for the Generation of Electricity and Certain Electric Transmission Facilities in California Quarterly Report

D.06-09-003, implementing portions of GO 131-D, requires PG&E, SCE, and SDG&E to file quarterly reports concerning transmission and generation interconnection projects.

In their SFI comments, PG&E and SDG&E propose reducing the frequency of this report to semi-annual, on the grounds that new infrastructure projects do not develop at a rate that justifies quarterly updates.

Staff concur that new information concerning transmission and generation projects does not develop on a quarterly schedule, meaning that quarterly

reports consume staff time without a corresponding increase in knowledge. Therefore, the reporting frequency is changed to semi-annual.

17. GO 77-M

GO 77-M requires utilities to file annual reports with respect to, e.g.: employee compensation and payments of dues, donations, subscriptions, and attorneys' fees. Employee compensation reports are due on May 31, and reports on other expenses are due on March 15.

In their SFI comments, PG&E, SCE, SoCal Gas, and SDG&E recommended harmonizing the filing dates to May 31 for administrative convenience, in recognition of the fact that utilities routinely request from the Commission (and are granted) extensions of the March 15 filing due date to May 31.

The California Water Association and PG&E recommended updating the dollar amounts of the reporting thresholds, which have not been adjusted since 2004.

Verizon recommended eliminating the requirement for Uniform Regulatory Frameworks communications carriers that are no longer subject to cost of service regulation. TURN argued that the Commission denied Verizon's request for relief from GO 77-M in 2012 on the grounds that the Commission has an ongoing duty to ensure that rates remain affordable, and that the Commission should not reconsider that decision in this SFI.

Staff make no recommendations at this time concerning increasing the reporting thresholds or exempting regulated entities from GO 77-M. However, harmonizing the filing dates of GO 77-M reports will reduce the administrative burden on utility staff who prepare the reports, and on Commission staff who receive the reports and grant annual extension requests. Therefore, the filing date for all GO 77-M reports is May 31. The following relevant sections of GO 77-M are edited as follows:

IT IS HEREBY ORDERED, That each public utility having gross annual operating revenues of more than \$500,000 but less than \$1 billion is directed and required to prepare and file with the Public Utilities Commission of the State of California on or before ~~March 31~~ **May 31** of each and every year a statement showing for the preceding calendar year: IT IS HEREBY FURTHER ORDERED, That each public utility having gross annual operating revenues of \$1 billion or more and that is not an electric corporation or a gas corporation is directed and required to prepare and

file with the Public Utilities Commission of the State of California on or before ~~March 31~~ **May 31** of each and every year a statement showing for the preceding calendar year:

IT IS HEREBY FURTHER ORDERED, that each public utility having gross annual operating revenues of \$500,000 or more is directed and required to prepare and file with the Public Utilities Commission of the State of California on or before ~~March 31~~ **May 31** of each and every year a statement showing for the preceding calendar year, the following information:

18. SCE Service Guarantee Semi-Annual Report

In D.04-07-022, the Commission adopted a compensatory rebate element to SCE's customer service guarantee program, and required SCE to file semi-annual reports detailing claims and payments to customers under the rebate program.

In its SFI comments, SCE argued that the reporting frequency should be changed to annual, which will reduce the administrative burden on SCE while still allowing the Commission to monitor the program. SCE contends that it will continue to explain any significant variances if any should occur from month to month during the reporting period.

Staff concur that annual reports with explanations for significant variances will provide Commission staff with sufficient information for ongoing program monitoring. Therefore, the reporting frequency is changed from semi-annual to annual.

19. Semi Annual Mover Services Report

In Resolution G-3456, the Commission granted SDG&E and SoCal Gas the authority to offer a "Mover Services" program providing connections to services such as phone, video, trash removal, security to customers requesting new service or changing locations of existing services. Resolution G-3456 requires that SoCal Gas and SDG&E file semi-annual reports detailing any complaints.

In their SFI comments, SoCal Gas and SDG&E urge that the reporting frequency be changed to annual in recognition of the low number of complaints associated with the Mover Services program.

Staff concur that the SoCal Gas and SDG&E Mover Services programs have generated few customer complaints, therefore the frequency of the SoCal Gas and SDG&E Mover Services Reports are changed to annual.

20. California Solar Initiative Thermal Program Quarterly Progress Report

Pursuant to D.10-01-022, the California Solar Initiative (CSI) Thermal Program Administrators jointly file a quarterly progress report on the CSI Thermal program.

In its SFI comments, SCE argues that the reporting frequency should be changed to annual, because its CSI Thermal program is out of money, and there is no new information to report.

Staff concur that most new information concerning the CSI Thermal program is available online at CSIThermalstats.org; however, staff believe the existing reports to have ongoing—if diminishing—value. Therefore, the reporting frequency is changed from quarterly to semi-annual.

21. California Solar Initiative Semi-Annual Administrative Activity Expense Report

Pursuant to D.07-05-047, CSI Thermal Program Administrators file semi-annual reports on administrative activities.

In their SFI comments, PG&E and SCE argue that the reporting frequency should be changed from semi-annual to annual due to reduced activity in the program.

Staff concur that decreased program activity justifies a change in reporting frequency from semi-annual to annual for the majority of the information in the report.

However, the category of CSI M&E labor expenses included in these reports has proven to be highly variable, and staff needs the information more frequently than is currently required, for the purpose of budget management.

Therefore, while the majority of the information in the Semi-Annual Administrative Activity Expense Report may be filed annually, a report detailing CSI M&E labor expenses must be filed quarterly.

22. California Solar Initiative Thermal Semi-Annual Expense Report

Pursuant to D.10-01-022, CSI Thermal Program Administrators submit semi-annual expense reports.

In its SFI comments, SCE argued that its CSI Thermal program is out of funding, and that the reporting frequency should be changed from semi-annual to annual because there is no longer sufficient information to justify semi-annual reporting.

Staff concur that decreased program activity justifies a change in reporting frequency from semi-annual to annual for the majority of the information in the report.

However, the category of CSI M&E labor expenses included in these reports has proven to be highly variable, and staff needs the information more frequently than is currently required, for the purpose of budget management.

Therefore, while the majority of the information in the CSI Thermal Expense Report may be filed annually, the CSI Thermal M&E labor expenses must be reported quarterly.

23. SONGS Unit 1 Decommissioning Report

In its SFI comments, SDG&E recommended merging the content of the quarterly SONGS Unit 1 Decommissioning Report into the SONG Units 2 and 3 Decommissioning Report.

Staff concurs that the Decommissioning Reports for SONGS Units 1, 2, and 3 should be consolidated into one report for the sake of administrative efficiency, provided that SDG&E precipitates out Unit 1 activities separately from Units 2 and 3.

24. PG&E Gas Pipeline Replacement Program Report

PG&E submits an annual report on its gas pipeline replacement program pursuant to D.86-12-095. The report is due on March 31.

In its SFI comments, PG&E observes that it requests and receives an extension from the Commission every year, and files the report on April 30. PG&E asks that the April 30 filing date be made permanent, in order to avoid annual extension requests.

Staff concur that receiving the report on April 30 will not alter its administration of the program, and that annual extension requests squander staff time. Therefore, the filing date of PG&E's Gas Pipeline Replacement Program Report is changed to April 30.

25. PG&E Gas Meter Protection Report

PG&E submits an annual report on gas meter protection pursuant to D.89-12-057. The report is due March 31.

In its SFI comments, PG&E observes that it requests and receives an extension from the Commission every year, and files the report on April 30.

PG&E asks that the April 30 filing date be made permanent, in order to avoid annual extension requests.

Staff concur that receiving the report on April 30 will not alter its administration of the program, and that annual extension requests squander staff time. Therefore, the filing date of PG&E's Gas Meter Protection report is changed to April 30.

26. Quarterly Telemetering Report

Pursuant to D.00-11-001, PG&E, SCE, and SDG&E file quarterly reports on telemetering equipment under Rule 21, the distributed generation interconnection tariff.

In its SFI comments, PG&E argued that the data in this report could be consolidated into the Rule 21 Interconnection Data Quarterly Report subsequently adopted in D.14-04-003.

Staff concurs that consolidating the Rule 21 Telemetering Quarterly Report into the Rule 21 Interconnection Data Quarterly Report would increase administrative efficiency; therefore the two reports are consolidated, and this consolidation is effective for PG&E, SCE, and SDG&E.

27. Quarterly Net Generation Output Metering Equipment Quarterly Report

Pursuant to D.00-11-001, PG&E, SCE, and SDG&E file quarterly reports on net generation output metering equipment under Rule 21, the distributed generation interconnection tariff.

In its SFI comments, PG&E argued that the data in this report could be consolidated into the Rule 21 Interconnection Data Quarterly Report subsequently adopted in D.14-04-003.

Staff concurs that consolidating the Rule 21 Net Generation Output Metering Equipment Quarterly Report into the Rule 21 Interconnection Data Quarterly Report would increase administrative efficiency; therefore the two reports are consolidated, and this consolidation is effective for PG&E, SCE, and SDG&E.

28. SCE Interruptible Load and Demand Response Programs Monthly Report

SCE files a monthly report on its interruptible load programs and demand response programs pursuant to D.09-08-027 in A.08-06-001.

In its SFI comments, SCE contends that Commission staff has requested a separate quarterly report containing the same information as the required monthly report, and argues that the quarterly report should be eliminated because it is duplicative.

Staff agrees that the quarterly report requested by staff is duplicative of the monthly report required by Commission order; therefore the quarterly report is eliminated, but the monthly report required pursuant to A.08-06-001 is undisturbed.

III. Proposed Administrative Follow-Up

29. GO 69-C

Background

GO 69-C permits public utilities to lease or encumber property provided either that the property is no longer used or useful in providing utility services to the public, or the lease or encumbrance will not interfere with the utility's ability to serve its customers. The version of GO 69-C on the Commission website reflects an effective date of July 10, 1985, but it is entitled "Proposed General Order No. 69-C" and it contains strikethrough edits.

In the SFI, Staff proposed that the Commission confirm that GO 69-C is final, has not been superseded, and remains in effect and, and the Commission's records be updated accordingly.

In their comments, AT&T, California Water association, California Cable and Telecommunications Association, SoCal Gas, SCE, SDG&E, PG&E, and the Small Local Exchange Carriers¹¹ agreed with Staff's proposal to confirm that GO 69-C is final and in effect. PG&E also noted that, in Resolution ALJ-268, the Commission discussed holding a workshop to clarify the applicability of GO 69-C.

¹¹ The Small Local Exchange Carriers are Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., The Siskiyou Telephone Company, Volcano Telephone Company and Winterhaven Telephone Company.

Discussion

Although the Commission website contains a “proposed” version of GO 69-C, parties’ comments suggest that GO 69-C is presumed to have been in effect since 1985. As recently as 2012, in Resolution ALJ-286, the Commission discussed holding a workshop to clarify which utility property transactions are covered by Public Utilities Code § 851, and which transactions are covered by GO 69-C, without suggesting that GO 69-C’s effectiveness was in question.

Accordingly, the relevant sections of GO 69-C are revised as follows:

~~Proposed~~ General Order No. 69-C

...

PROVIDED, HOWEVER, that each such grant, other than a grant by a public utility to the State of California or a political subdivision thereof for a governmental use superior to the use by the public utility under the provisions of ~~Section 1240.610 of the Code of Civil Procedure, or a grant to the United States Government or any agency thereof for a governmental use, shall be~~ made conditional upon the right of the grantor, either upon order of this Commission or upon its own motion to commence or resume the use of the property in question whenever, in the interest of service to its patrons or consumers, it shall appear necessary or desirable to do so.

...

The effective date of this order shall be ~~July 10, 1985~~.

Summary of Proposed Changes

ITEM	PROPOSED CHANGE	RELEVANT COMMISSION DECISIONS/DOCKETS
1. General Order 65-A	Repeal reporting requirements when financial reports are publicly available online	Revised by Resolution A3637
2. PG&E Report on Sole Customer Facility Sale Transactions	Repeal report	D.99-12-030 in A.99-04-048. Made redundant by Resolution ALJ-268.
3. General Order 152-A	Repeal reports	D.88-11-008 in A.87-09-025
4. SDG&E and SoCalGas System Expansion Study	Repeal study	D.07-12-019 in A.06-08-026
5. Advanced Metering Infrastructure Reports	Repeal report	D.06-07-027 in A.05-06-028; D.07-04-043 in A.05-03-015; D.08-09-039 in A.07-07-026.
6. Annual Caller ID Blocking Report	Repeal report	D.92-06-065 and D.92-11-062 in A.90-11-011, A.90-12-065, and A.91-01-039; D.96-04-049 in R.95-04-043 and I.95-04-044.
7. General Order 107-B	Amend General Order to repeal report in the absence of findings	D.83-06-021 and D.83-10-090 in OII 103
8. Top Ten SCE Executives' Total Compensation	Repeal report	D.04-07-022 in A.02-05-004
9. Quarterly Reports on Installed Customer Generation	Repeal report	D.03-04-030 in R.0201011; Resolution E-3831
10. California Solar Initiative Program Administrators Quarterly Report	Repeal report	D.10-09-046 in R.10-05-004
11. Demand Response	Repeal report	D.06-07-027 in A.05-06-028

Estimate For Each Smart Rate Season		
12. PG&E Safety Net program	Change reporting frequency to annual	D.04-05-055 in A.02-09-005, A.02-11-017, and I.03-01-012
13. PG&E Quality Assurance Standards	Change reporting frequency to annual	D.04-05-055 in A.02-09-005, A.02-11-017, and I.03-01-012
14. PG&E Call Center Performance Measure	Change reporting frequency to annual	D.04-10-034 in A.02-09-005, A.02-11-017, and I.03-01-012
15. Cogeneration and Small Power Production Report	Change reporting frequency to annual	Resolution E-1738
16. AB 970/GO 131-D Planning and Construction of Facilities for the Generation of Electricity and Certain Electric Transmission Facilities in California Quarterly Report	Change reporting frequency to semi-annual	D.06-09-003 in I.00-11-001
17. General Order 77-M	Harmonize filing dates to May 31	D.06-12-029 in R.05-10-030
18. SCE Service Guarantee	Change reporting frequency to annual	D.04-07-022 in A.02-05-004
19. Semi Annual Mover Service Report	Change reporting frequency to annual	Resolution G-3456
20. California Solar Initiative Thermal Program Quarterly Progress Report	Change reporting frequency to semi-annual	D.10-01-022 in R.08-03-008
21. California Solar Initiative Semi-Annual Administrative Activity Expense Report	Change reporting frequency to annual for most elements; increase reporting frequency to quarterly for CSI M&E labor expenses	D.07-05-047 in R.06-03-004
22. California Solar	Change reporting	D.10-01-022 in R.08-03-008

Initiative Thermal Semi-Annual	frequency to annual for most elements; increase reporting frequency to quarterly for CSI M&E labor expenses	
23. SONGS Unit 1 Decommissioning Report	Consolidate with SONGS Units 2 and 3 Decommissioning Report	A.09-04-007, A.09-04-009
24. PG&E Gas Pipeline Replacement Program Report	Change filing date to April 30	D.86-12-095 in I.86-07-032
25. PG&E Gas Meter Protection Report	Change filing date to April 30	D.89-12-057 in A.88-12-005, I.89-03-033
26. Quarterly Telemetry Report	Consolidate with Rule 21 Interconnection Data Quarterly Report	D.00-11-001 in R.99-10-025
27. Net Generation Output Metering Equipment Quarterly Report	Consolidate with Rule 21 Interconnection Data Quarterly Report	D.00-11-001 in R.99-10-025
28. SCE Interruptible Load and Demand Response Programs Monthly Report	Quarterly report requested by staff is repealed, monthly report required by Commission decision retained	D.09-08-027 in A.08-06-001
29. General Order 69-C	Remove redline edits to confirm that order is final and in effect	Resolution L-230